

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Ameren Transmission Company of Illinois	}	
	}	
Petition for a Certificate of Public Convenience	}	
and Necessity, pursuant to Section 8-406.1 of	}	
the Illinois Public Utilities Act, and an Order	}	
pursuant to Section 8-503 of the Public Utilities	}	Case No.: 12-0598
Act, to Construct, Operate and Maintain a New	}	
High Voltage Electric Service Line and Related	}	
Facilities in the Counties of Adams, Brown, Cass,	}	
Champaign, Christian, Clark, Coles, Edgar,	}	
Fulton, Macon, Montgomery, Morgan, Moultrie,	}	
Pike, Sangamon, Schuyler, Scott, and Shelby,	}	
Illinois.	}	

REBUTTAL TESTIMONY

OF

PAUL BERGSCHNEIDER

Intervenor MSSCLPG Exhibit 4.0

REBUTTAL TESTIMONY OF PAUL BERGSCHNEIDER

Q. PLEASE STATE YOUR NAME AND CURRENT RESIDENTIAL ADDRESS.

A. Paul J. Bergschneider. 846 Franklin-Alexander Road, Franklin, Illinois 62638.

Q. ARE YOU FAMILIAR WITH THE PROCEEDING IN WHICH YOU ARE SUBMITTING THIS TESTIMONY?

A. Yes, I am.

Q. ARE YOU AUTHORIZED TO TESTIFY ON BEHALF OF, AND AS A REPRESENTATIVE OF, THE MORGAN, SANGAMON, AND SCOTT COUNTIES LAND PRESERVATION GROUP?

A. Yes, I am.

Q. HAVE YOU HAD A CHANCE TO REVIEW THE DIRECT TESTIMONY WHICH WAS FILED IN THIS MATTER BY ILLINOIS COMMERCE COMMISSION STAFF AND VARIOUS OTHER INTERVENORS?

A. Yes, I have.

Q. DID ANYTHING FOUND IN THE DIRECT TESTIMONY WHICH WAS FILED IN THIS MATTER BY ILLINOIS COMMERCE COMMISSION STAFF AND VARIOUS OTHER INTERVENORS AT ALL CHANGE THE POSITION OF THE MORGAN, SANGAMON, AND SCOTT COUNTIES LAND PRESERVATION GROUP WITH REFERENCE TO THE ATXI PROPOSED ALTERNATE ROUTE?

A. No, it did not. In fact, the Morgan, Sangamon, and Scott Counties Land Preservation Group is as steadfast as ever in its opposition of the proposed Alternate Route.

Q. DIRECTING YOUR ATTENTION SPECIFICALLY TO THE REVISED DIRECT

23 TESTIMONY PRESENTED IN THIS MATTER BY COMMISSION STAFF
24 WITNESS GREG ROCKROHR (ICC STAFF EXHIBIT 1.0R), HAVE YOU HAD A
25 CHANCE TO REVIEW THIS TESTIMONY WITH A VIEW TOWARD HOW IT
26 MIGHT RELATE TO THE INTERESTS OF THE MORGAN, SANGAMON, AND
27 SCOTT COUNTIES LAND PRESERVATION GROUP AND, IF YOU HAVE, WHAT
28 ARE YOUR THOUGHTS?

29 A. I have. I read the testimony of Staff Witness Rockrohr with an open mind and with an
30 understanding of the positions taken by the other intervenors in this matter, specifically those
31 whose interests reside in the segment of the proposed Project from Meredosia to Pawnee,
32 Illinois. Mr. Rockrohr's testimony, as it relates to the segment from from Meredosia to
33 Pawnee, Illinois, can be found in ICC Staff Exhibit 1.0R at pp. 34-37. I found Mr.
34 Rockrohr's analysis and findings to be well reasoned and most in line with protecting the
35 interests of the various intervenors whose interests reside within the segment of the proposed
36 Project from Meredosia to Pawnee, Illinois. In fact, the Morgan, Sangamon, and Scott
37 Counties Land Preservation Group officially wishes to join and endorse the testimony of
38 Illinois Commerce Commission Staff Witness Rockrohr, specifically found at lines 765-776,
39 where he states in relevant part as follows, to wit: "After reviewing the various route
40 proposals, it appears to me that constructing this segment parallel to the existing 138 kV line
41 [. . .] would result in by far the shortest and lowest cost route. [. . .] ATXI's cost estimate
42 provided in ATXI Ex. 7.4 indicates that constructing the line along ATXI's alternate route
43 would be \$15 million more costly than constructing it along ATXI's primary route. Should
44 ATXI provide compelling evidence in its rebuttal testimony that it cannot construct this

45 segment along the route [parallel to the existing 138 kV line], or that construction on that
46 route would be more costly than other options, then it is my opinion that ATXI's primary
47 route, as modified by Pearces' first alternative [Intervenor Gregory and Theresa Pearce's
48 Primary Alternate Route, filed herein on January 3, 2013] would be the next most logical
49 route."

50 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

51 **A.** Yes, it does.